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LINKSMART WIRELESS TECHNOLOGY, LLC

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LINKSMART WIRELESS TECHNOLOGY,  
LLC

*Plaintiff,*

vs.

CAESARS ENTERTAINMENT  
CORPORATION,

*Defendant.*

2:18-cv-00862-MMD-NJK - LEAD

**JOINT STIPULATION TO STAY  
LITIGATION PENDING *INTER PARTES*  
REVIEW**

Plaintiff Linksmart Wireless Technology, LLC and Defendants Caesars Entertainment Corp., Las Vegas Sands Corp., Golden Nugget, Inc., Landry's Inc., MGM Resorts International, and Wynn Las Vegas, LLC hereby stipulate to stay this litigation pending the *inter partes* review ("IPR") of the patent-in-suit, U.S. Reissued Patent No. RE46,459 ("459 Patent"), filed by Panasonic on October 9, 2018, Case No. IPR2019-00043 ("Panasonic IPR"). Further, although no additional IPRs have been filed against the '459 Patent yet, the parties believe additional IPRs will be filed against the '459 Patent in the coming months and stipulate to stay this litigation pending those IPRs as well.

For the Panasonic IPR, the parties expect the Patent Trial and Appeal Board ("PTAB") to issue a decision on institution in May 2019. Because this litigation is in its early stages, the parties desire to conserve the parties' and the Court's resources, and allow the Panasonic IPR to run its course at the PTAB before proceeding further in this litigation. Therefore, the parties stipulate to a stay of this litigation pending the Panasonic IPR proceeding. Specifically, the parties stipulate to a stay until the PTAB dismisses the IPR or issues a final written decision, which is estimated to occur 18 months from now, or May 2020.

Further, the parties anticipate that additional IPRs will be filed against the '459 Patent in the coming months, including IPRs filed by Defendants here and other defendants in parallel lawsuits in the Central District of California and the Eastern District of New York that were initiated within a month of this litigation. In the interest of conserving party resources and judicial economy, the parties stipulate to a stay of this litigation until all of the IPRs filed against the '459 Patent by a current defendant<sup>1</sup> in the various Linksmart cases have either been dismissed or have reached a final written decision by the PTAB, which is estimated to occur by December 2020.

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<sup>1</sup> The current defendants are: (C.D. Cal.) Gogo LLC, Aerovias de Mexico S.A. de C.V., Air Canada, Société Air France, Koninklijke Luchtvaart Maatschappij, N.V., Alaska Airlines, Inc., American Airlines, Inc., British Airways, plc, Delta Air Lines, Inc., United Airlines, Inc., Panasonic Avionics Corp, Emirates, The Emirates Group, Southwest Airlines Co., WestJet Airlines Ltd., and WestJet Operations Corp.; (Nev.) Caesars Entertainment Corp., Las Vegas Sands Corp., Golden Nugget, Inc., Landry's Inc., MGM Resorts International, and Wynn Las Vegas, LLC; (E.D.N.Y.) DCI-Design Communications LLC and Deep Blue Communications, LLC.

The parties shall submit to the Court a status report within 14 days following the PTAB's decision on institution for the Panasonic IPR. If instituted, the parties shall submit to the Court a status report within 14 days following the PTAB's final written decision (or dismissal) for the Panasonic IPR. The parties shall also submit to the Court a status report by July 15, 2019, concerning the status of all other IPRs filed against the '459 Patent by a current defendant, and are willing to submit additional status reports as the Court deems appropriate.

In light of this stipulation, the parties respectfully request the Court to vacate all deadlines in this litigation.

For the foregoing reasons, the Parties respectfully request that the Court enter an order staying the above-captioned cases pending IPR proceedings and vacating all deadlines. The Parties have stipulated to these terms and signed below.

Respectfully submitted,

Dated: November 7, 2018

**RUSS, AUGUST & KABAT**

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Dated: November 7, 2018

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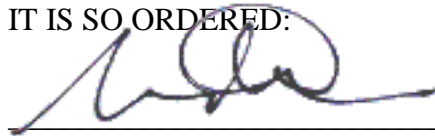
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*Attorneys for Defendants*  
**CAESARS ENTERTAINMENT  
 CORPORATION and WYNN LAS VEGAS,  
 LLC**

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

Dated: November 7, 2018

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically through the Court's CM/ECF system. As such, the foregoing document was served on all counsel who have consented to electronic service pursuant to LR 5-1.

DATED: November 7, 2018

/s/ Kent Shum  
Kent N. Shum